UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

DAMILARE SONOIKI,

Plaintiff,

v.

Civil Action No. 1:19-cv-12172-LTS

HARVARD UNIVERSITY, et al.,

Defendants.

PLAINTIFF'S MOTION TO BIFURCATE DISPOSITIVE MOTIONS BRIEFING SCHEDULE INTO PHASES CONCERNING LIABILITY AND DAMAGES

Now comes Plaintiff Damilare Sonoiki, ("Plaintiff" or "Damilare") by and through counsel, to request separate, sequential phases of briefing dispositive motions: first concerning liability, and then damages (the "Motion"). For all of the reasons set forth in the accompanying Memorandum in Support, Plaintiff respectfully requests that the Motion be granted.

Respectfully Submitted,

KOHRMAN JACKSON & KRANTZ LLP

/s/ Anna E. Bullock

SUSAN C. STONE (pro hac vice) KRISTINA W. SUPLER (pro hac vice) ANNA E. BULLOCK (pro hac vice) 1375 East Ninth Street, 29th Floor Cleveland, Ohio 44114-1793

Telephone: (216) 696-8700 Facsimile: (216) 621-6536

Email: scs@kjk.com; kws@kjk.com

NESENOFF & MILTENBERG, LLP

TARA J. DAVIS (BBO # 675346) 101 Federal Street, 19th Floor Boston, Massachusetts 02110 Telephone: (617) 209-2188 Facsimile: (212) 736-2260

Email: Tdavis@nmllplaw.com

Counsel for Plaintiff Damilare Sonoiki

LOCAL RULE 7.1 CERTIFICATION

The undersigned counsel certifies that Plaintiff has conferred with opposing counsel concerning this request and opposing counsel indicated that Defendants object and will oppose the Motion.

Dated: December 16, 2022 Respectfully Submitted,

KOHRMAN JACKSON & KRANTZ LLP

/s/ Anna E. Bullock

SUSAN C. STONE (pro hac vice) KRISTINA W. SUPLER (pro hac vice) ANNA E. BULLOCK (pro hac vice) 1375 East Ninth Street, 29th Floor Cleveland, Ohio 44114-1793 Telephone: (216) 696-8700 Facsimile: (216) 621-6536

Email: scs@kjk.com; kws@kjk.com

NESENOFF & MILTENBERG, LLP

TARA J. DAVIS (BBO # 675346) 101 Federal Street, 19th Floor Boston, Massachusetts 02110 Telephone: (617) 209-2188

Facsimile: (212) 736-2260 Email: Tdavis@nmllplaw.com

Counsel for Plaintiff Damilare Sonoiki

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the above document upon all parties with an interest in this matter by electronically filing it through this Court's CM/ECF filing system this December 22, 2022.

/s/ Anna E. Bullock
ANNA E. BULLOCK (pro hac vice)